

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

FEB - 3 2017

David A. Bradley, Clerk of Court

United States of America

v.

SAMSON OLUGBENGA OYEKUNLE aka  
WOLE BROWN

Case No.

H17-0140M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/16/2016 - 02/02/2017 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC Sec. 1343

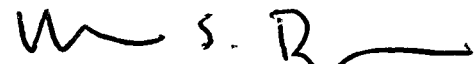
Wire Fraud

18 USC Sec. 1546

Fraud and Misuse of Visas, Permits, and other Documents

This criminal complaint is based on these facts:

See Attached Affidavit of US Postal Inspector Matthew S. Boyden

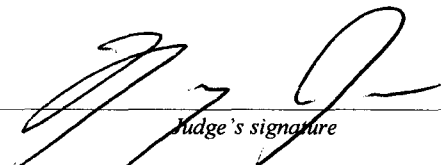
☒ Continued on the attached sheet.

Complainant's signature

US Postal Inspector Matthew S. Boyden

Printed name and title

Sworn to before me and signed in my presence.

Date: 2-3-17City and state: Houston, Texas

Judge's signature

Nancy K. Johnson, US Magistrate Judge

Printed name and title

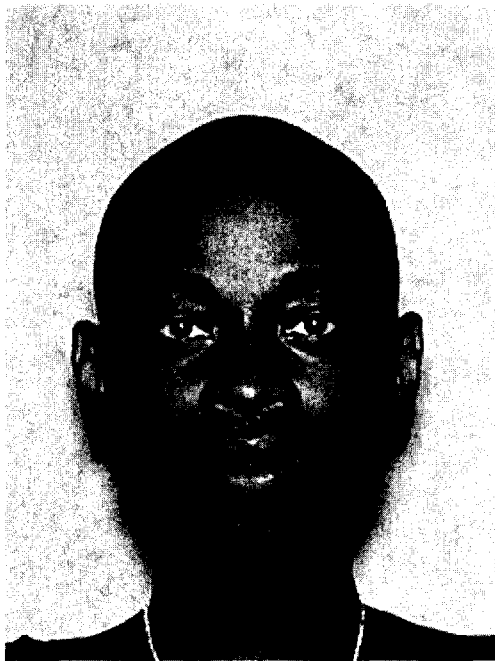
## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

1. Affiant, United States Postal Inspector Matthew S. Boyden, has been employed by the U.S. Postal Inspection Service since January 2000. Affiant is currently assigned to the Major Fraud team in Houston, Texas. Prior to that, Affiant served as a lieutenant of police for a municipal police department in Texas. Affiant has served in the U.S. Air Force as a Law Enforcement Specialist and criminal investigator for the Air Force Office of Special Investigations. Affiant has received specialized training in numerous Postal crimes, but primarily those involving "identity theft" and mail fraud related offenses. Affiant has attended training in the areas of check fraud, credit card fraud, and identity takeover schemes. Affiant has investigated hundreds of cases involving fraud, identity theft, and related "white collar" types of offenses. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against Nigerian National **SAMSON OLUGBENGA OYEKUNLE** aka **WOLE BROWN**.
2. The information set forth in this Affidavit is based upon your Affiant's personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that **SAMSON OLUGBENGA OYEKUNLE** aka **WOLE BROWN** has committed violations of federal law.
3. For the past several months, Affiant has been investigating numerous Business E-mail Compromise (BEC) complaints. The FBI defines BEC fraud as a sophisticated scam targeting businesses that regularly perform wire transfer payments. The scam is carried out by compromising legitimate business e-mail accounts through social engineering or computer intrusion techniques to conduct unauthorized transfers of funds. Most victims report using wire transfers as a common method of transferring funds for business purposes; however, some victims report using checks as a common method of payment. The fraudsters will use

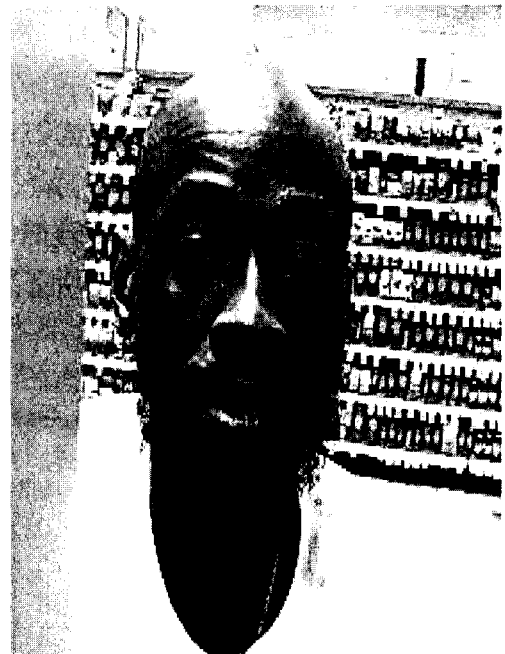
the method most commonly associated with their victim's normal business practices. Affiant has identified numerous bank accounts opened with counterfeit passports in and around Houston that are being funded with fraudulent BEC wire transfers. All of these wires involve the use of interstate wire communications facilities.

4. On or about August 16, 2016, an individual (later identified as SAMSON OLUGBENGA OYEKUNE) used a counterfeit Ghanaian passport G0593616 and United States Visa in the name WOLE BROWN to open a bank account at Chase Bank in Houston, Texas. The individual listed an address of 2501 Tanglewilde St. #137, Houston, Texas 77063. Affiant learned from SA Katherine Langston with the Department of State, Diplomatic Security Service, that the WOLE BROWN passport and visa are fraudulent. According to Chase Bank fraud investigators, the account was used to receive over \$200,000 in fraudulent deposits. Below is a partial list of fraudulent deposits to the account:
  - \$11,750 wire on 10/21/16 from the Dependable Vehicle Delivery LLC account at Vystar Credit Union
  - \$31,300 wire on 10/26/16 from the James M. Cummins account at Navy Federal Credit Union
  - \$15,000 wire on 11/10/16 from the Law Office of J. David Black account at First Republic Bank
  - \$15,000 wire on 11/22/16 from the Billie M. McDonald account at Manufacturers and Traders Trust Bank
5. Affiant conducted a review of multiple law enforcement and financial databases and learned that the fraudulent WOLE BROWN passport was used at other financial institutions like Bank of America, Capital One Bank, First National Bank Texas, and Wells Fargo Bank to facilitate fraud payments from victims. According to those records over \$500,000.00 has been deposited and withdrawn through these fraud accounts.

6. On February 2, 2017, Affiant received bank video and surveillance of the impostor using the WOLE BROWN passport. That information was provided to SA Langston who developed SAMSON OLUGBENGA OYEKUNLE using facial recognition software and technology. SA Langston provided Affiant with several different photos of OYEKUNLE which clearly depict the same person using the WOLE BROWN documents. Affiant also obtained the Texas Department of Public Safety photos of OYEKUNLE which also depict the same person. In the Texas DPS photo of OYEKUNLE he appears to be wearing the same jewelry that is shown in a photo taken by First National Bank Texas. The following is a side by side comparison:

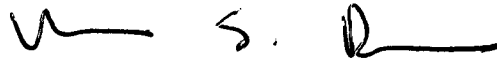


Texas DPS – SAMON OYEKUNLE



First National Bank Texas – WOLE BROWN

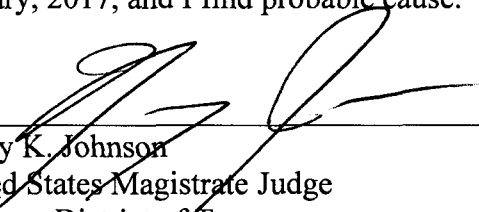
7. Based upon the above, the undersigned believes there is probable cause to believe that SAMSON OLUGBENGA OYEKUNLE aka WOLE BROWN has committed crimes in violation of Title 18, United States Code, Sections 1343, and 1546.



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Matthew S. Boyden  
United States Postal Inspector

Sworn and Subscribed to me this 3<sup>rd</sup> day of February, 2017, and I find probable cause.



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Nancy K. Johnson  
United States Magistrate Judge  
Southern District of Texas